



# Indiana Department of Education

SUPPORTING STUDENT SUCCESS

January 5, 2011

Dr. Jeff Butts, Superintendent  
MSD Wayne Township  
1220 S High School Rd.  
Indianapolis, IN 46241

Dear Dr. Butts:

On November 17, 2010, the Indiana Department of Education's (IDOE) English Language Learning & Migrant Education staff commenced an on-site monitoring review of MSD Wayne Township' administration of Title III of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB), and the State of Indiana Non-English Speaking Program (NESP). Enclosed is a report based upon those reviews.

Prior to, during, and following the on-site monitoring review, the IDOE staff conducted a number of activities (described in the attached report) to verify compliance with the programmatic requirements of Title III and the State of Indiana Non-English Speaking Program.

The enclosed report summarizes the results of the on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, MSD Wayne Township is responsible for taking appropriate action to remedy compliance deficiencies. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, MSD Wayne Township must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE is available to provide technical assistance as appropriate.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting MSD Wayne Township with improving the delivery of Title III and NESP services.

Sincerely,

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Nicole Law, Title III/NESP Program Administrator, MSD Wayne Township  
Heather Pierce, Principal, Chapelwood Elementary School, MSD Wayne Township  
Sheri Marcotte, Principal, Chapel Hill Junior High School, MSD Wayne Township  
Joel McKinney, Principal, Ben Davis High School, MSD Wayne Township

**Indiana Department of Education  
Title III and Non-English Speaking Program Monitoring**

**District:** MSD Wayne Township

**Monitoring Staff:** Olga Tuchman, English Language Learning (ELL) Specialist;  
Angela Mello, ELL Specialist; Mary Gardner, ELL Specialist

The Indiana Department of Education (IDOE) commenced on-site monitoring of MSD Wayne Township on November 17, 2010. The purpose of the on-site monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with the Title III and Non-English Speaking Program requirements.

IDOE specifically monitored in the following areas:

<b>Monitoring Topic</b>		<b>Statutory Citation</b>
1.1	Compliance with the English Language Proficiency Assessment requirements	NCLB, Title III §3113 NCLB, Title III §3116
1.2	Compliance with requirements specific to meeting the Annual Measurable Achievement Objectives (AMAOs)	NCLB, Title III §3122(a)(1-3) NCLB, Title III §3111(b)(2)(B)
1.4	Compliance with the English Language Proficiency (ELP) Standards requirements	NCLB, Title III §3113
1.5	Compliance with Data Collection and Reporting requirements	NCLB, Title III §3121; §3123 EDGAR 34; CFR 76.731
2.1	Compliance with requirements for	NCLB, Title III §3111 (b)(2)

	English Language Acquisition and Language Enhancement Programs	
2.2	Activities by LEAs with Significant Influx of Immigrant Children and Youth	NCLB, Title III, 3114 and 3115 (e)
2.3	Non-Public School Participation	NCLB, Title III, 9501
2.4	Compliance with Parental Notice and Outreach requirements	NCLB, Title III §3302 Title VI, 34 CFR § 100.3 (a)(b)
2.5	Compliance with Program Design and Implementation requirements	NCLB, Title III §3115

During the on-site visit, IDOE spent time interviewing staff from MSD Wayne Township. In addition, IDOE visited Chapelwood Elementary School, Chapel Hill Junior High School, and Ben Davis High School, where interviews were conducted with the principals, ESL and general education staff. IDOE also reviewed documents from MSD Wayne Township, including district ESL policies and procedures, district notices to parents and student record information.

Crowe Horwath, LLP, independently contracted by the IDOE, conducted the fiscal monitoring review of the district's Title III and Non-English Speaking grant expenditures.

Based on the above information, the report follows.

## **Monitoring Topic 1.1: Compliance with NCLB, Title III Compliance with the English Language Proficiency Assessment Requirements**

### **Background**

IDOE interviewed the Title III Program Administrator and corporation's teaching staff regarding compliance with the English Language Proficiency Assessment requirements.

*Statutory Requirements are contained in Sections 3113 and 3116.*

### **Areas of Compliance**

**Home Language Survey Implementation:** The Home Language Survey (HLS) is part of the enrollment packet for newly enrolling students. Information on administering the HLS is documented in the MSD Wayne Township English as a New Language (ENL) Program

Handbook which was reviewed during the visit. The Home Language Survey and sample EL students' Home Language Surveys from their cumulative folders were also reviewed.

**English Language Proficiency Assessment:** Placement tests and spring LAS Links English Proficiency testing are administered by the ENL teachers. School secretaries, upon receiving the enrollment packet and Placement testing results, enter the information on EL students into the CrossPoint data system. The Title III/NESP Coordinator and Home/School liaison provide training to all staff involved in LAS Links Placement and LAS Links Spring Proficiency testing. This training, as well as the IDOE/CTB McGraw-Hill WebEx training, is used to train the new ENL teachers involved in administering the tests. LAS Links Proficiency training materials were presented during the review as well as the Las Links Proficiency testing schedule. A roster of EL students who participated in 2010 Proficiency test administration and sample LAS Links reports for EL students of different levels of English proficiency were provided by the district as well as testing schedules and a written description of the process used to distribute the LAS Links Proficiency testing results to appropriate staff. The district's LAP program Coordinator conducts meetings for principals and teachers after LAS Links results are released.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.1**

**Recommendation:** It is recommended that MSD Wayne Township catalog agendas and sign-in sheets from each training.

## **Monitoring Topic 1.2: Annual Measurable Achievement Objectives (AMAOs)**

### **Background**

IDOE interviewed the Title III Program Administrator, school principals, and Title III staff regarding the delivery of English language development services as they relate to meeting the AMAOs. In addition, IDOE reviewed ILP documentation provided during the on-site visit.

*Statutory Requirements are contained in Section 3122(a)(1-3) and Section 3111 (b)(2)(B)*

### **Areas of Compliance**

**English Language Development Services in ESL and Content Area Classes:** Language development in the district is provided by ESL teachers using different approaches through a

combination of push-in and pull-out based on EL students' levels of English proficiency. Level 1 elementary, middle and high school EL students are served through Newcomer ENL classes. Level

2-4 EL students receive push-in services. In all schools visited (Chapelwood Elementary School, Chapel Hill Junior High School, and Ben Davis High School) ENL teachers are aware of the standards and skills being taught in subject area classes and align their plans to match the classroom teachers' plans in order to incorporate these concepts within the ELD classes for reinforcement. Samples of English Language Development (ELD) daily schedules were provided during the review. Lesson plans with content and language objectives and SIOP peer observation forms from subject areas teachers at Ben Davis HS were presented during review.

**AMAO Determinations:** Information on how the Title III Annual Measurable Achievement Objectives (AMAO) performance targets and district accountability are calculated is communicated to the administration and instructional staff by the Title III/NESP Coordinator. A copy of that presentation was provided by the district during the review. This topic was a part of the EL Accelerated training sessions. For SY 2009-10 MSD Wayne Township met the AMAO performance targets in each of the three areas (making progress, attainment of English proficiency, and Adequate Yearly Progress for the LEP sub-group).

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.2**

There are no findings, required actions, or recommendations for Topic 1.2.

## **Monitoring Topic 1.4: Compliance with the English Language Proficiency (ELP) Standards requirements**

### **Background**

IDOE interviewed the Title III Program Administrator, school principals, general education teachers and Title III staff regarding usage of the English Language Proficiency Standards.

*Statutory Requirements are contained in Section 3113.*

### **Areas of Compliance**

**Training and Technical Assistance:** Implementation of ELP Standards is part of the strategic plan for district-wide professional development. Teachers interviewed demonstrated knowledge of ELP Standards and their importance for providing Sheltered and differentiated instruction.

**Ongoing Use of the English Language Proficiency Standards:** Guidance regarding the use of ELP Standards to guide instruction and assessment is included as part of all MSD Wayne Township Individualized Instructional Plans (IIPs). The agenda for the June 1, 2010 LAP Retreat "Educating EL Students for the 21<sup>st</sup> Century" was presented during the review. The agenda outlined specific learning outcomes to address IIPs. IIPs contain recommendations for mainstream teachers regarding provision of specific adaptations/modifications for EL students appropriate to their levels of English proficiency. Teachers interviewed provided evidence of implementation of modifications and adaptations for EL students corresponding to their levels of English proficiency.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.4**

There are no findings, required actions, or recommendations for Topic 1.4.

## **Monitoring Topic 1.5: Compliance with Data Collection and Reporting requirements**

### **Background**

IDOE interviewed the Title III Program Administrator regarding the formal data reporting process specific to English Language Learners (ELs).

*Statutory Requirements are contained in Section 3121 and 3123; EDGAR 34 and CFR 76.731.*

### **Areas of Compliance**

**DOE-LM Reporting:** ENL teachers are responsible for updating and submitting the information on their EL students to the school secretaries who enter the data into the CrossPoint data system.

In order to ensure accuracy of the DOE-LM report, a list of EL students is printed from the CrossPoint data system by the school secretary. This list is then cross-referenced with the EL students' roster. Discrepancies are flagged, researched and corrections made as necessary. The Technology Application/Data Specialist is responsible for submitting the DOE-LM data to the IDOE.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1.5**

There are no findings, required actions, or recommendations for Topic 1.5.

### **Monitoring Topic 2.1: Compliance with requirements for English Language Acquisition and Language Enhancement Programs: Programmatic Support**

#### **Background**

IDOE interviewed the Title III Program Administrator, school principals, and ELL teaching staff regarding English language development programs. In addition, IDOE reviewed policies and other documentation provided during the on-site visit.

*Statutory Requirements are contained in Section 3111 (b)(2)*

#### **Areas of Compliance**

**Use of Professional Development provided by the state:** Guidance documents addressing the educational needs of LEP students from the IDOE, Office of English Language Learning & Migrant Education, are used in the MSD Wayne Township. The Title III/NESP Program Coordinator provides training every year to administrators, principals, new teachers and other staff on the goals of the MSD Wayne Township Language Assistance program, using relevant IDOE provided training materials.

**Professional Development to staff provided by the district:** The focus of professional development in the area of English Learners' education in MSD Wayne Township is ELD (English language development) program redesign. The components are:

- continuation of SIOP (Sheltered Instruction Observation Protocol) team training and implementation throughout the year;
- highly interactive two-day seminars ("Accelerating Academic Achievement for English Language Learners," English Language Development Curriculum and collaborative teaching model) for K-12 general education teachers, ENL teachers, paraprofessionals, and administrators from Bonnie Bishop of the Leadership and Learning Center, followed by modeling, coaching and co-teaching;
- meetings with school principals on assessment of the fidelity of ELD service delivery.

The district provided participants' sign-in sheets from the training dates of November 16-17 and December 7-8, 2010. LAP (Language Assistance Program) meetings for district ESL teachers and paraprofessionals working in the language development occur every other

month. Agendas were provided. Agendas and sign-in sheets from the September 24, 2009, April 21, 2010 and September 23, 2010 ENL broad-based committee meetings that outline time spent on data analysis for EL students using LAS Links results and analysis of testing items from ISTEP+, NWEA, and reading levels data were also provided.

**Collaboration:** Collaboration between general education staff and ESL program happens throughout the school year. Examples of collaborative activities include: SIOP team training and implementation, collaborative teaching that is encouraged and supported in the district, scheduled teacher collaboration time (once a week at the elementary level, twice a month at the middle school level, and once a month at the high school level) with shared learning and common lesson planning. Evidence presented during the review included LAP meeting agendas, notes and the LAP calendar. Ongoing collaboration between ESL program staff and general education staff was evident in all three schools visited: Chapelwood Elementary School, Chapel Hill Junior High School, and Ben Davis High School. Teachers in these schools collaborate in planning and implementation of instruction and assessment for their EL students. An Individual Instructional Plan (IIP) is created for every EL student and is shared with all staff.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.1**

There are no findings, required actions, or recommendations for Topic 2.1

## **Monitoring Topic 2.2: Activities by LEAs with Significant Influx of Immigrant Children and Youth**

### **Background**

The district received additional Title III funding in the amount of \$72,480.00 based on a significant influx of immigrant students in 2008-09. IDOE interviewed the Title III Program Administrator and reviewed documentation provided. Documentation included the 2010-11 Title III Grant application, student records and the "Key Roles and Responsibilities of Paraprofessionals for Immigrant/Newcomer Students" document.

*Statutory Requirements are contained in Section 3114 and 3115 (e)*

### **Areas of Compliance**

#### **Approved Activities for Significant Influx of Immigrant Students**



To provide support to students and families new to the country and to support secondary immigrant/newcomer EL students in their transition to high school in an effective manner, two paraprofessionals will be hired at Lynhurst Junior High School and Chapel Hill Junior High School to work under the supervision of certified ENL and mainstream teachers. Paraprofessionals will also assist with interpretation/translation for newcomer students and their parents as needed for teacher/school and parent communication. The ENL Director will meet with paraprofessionals quarterly to support them as they differentiate the district's level of services for the immigrant/newcomer students and families.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.2**

There are no findings, required actions, or recommendations for Topic 2. 2.

## **Monitoring Topic 2.3: Non-Public School Participation**

### **Background**

IDOE interviewed the Title III Program Administrator regarding communication with and guidance/support provided to non-public schools.

*Statutory Requirements are outlined in Title III, Section 9501.*

### **Areas of Compliance**

**Communication:** At the beginning of each school year, the MSD Wayne Township ENL Coordinator sends a letter to non-public schools describing the Title III Language Development Program, English Proficiency assessment, and reporting of EL students. Invitations to all professional development events provided by the MSD Wayne Township are extended to the non-public school in case they have EL students enrolled. Evidence of the MSD Wayne Township's awareness of public schools' responsibilities and the established process of communication with non-public schools was provided during the review. The letter/invitation to a meeting, invitation response form, and responses from Westside Christian School and Our Shepherd School reporting no EL students were documented as evidence.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.3**

There are no findings, required actions, or recommendations for Topic 2. 3.

## **Monitoring Topic 2.4:**

### **Compliance with Parental Notice and Outreach requirements**

#### **Background**

IDOE interviewed the Title III Program Administrator and reviewed additional documentation regarding parental notice and outreach requirements.

*Statutory Requirements are outlined in Title III, Section 3302 and Title VI 34 C.F.R. § 100.3 (a)(b).*

#### **Areas of Compliance**

**Annual Parental Notification:** MSD Wayne Township provided evidence of meeting the 30 calendar day requirement about informing parents of their child's identification for participation in the district's language assistance program. A written description of staff responsibilities for sending out the notification and updating EL students' files was provided.

**Parent Outreach:** MSD Wayne Township has an effective communication system in place to connect with parents. A Parent Handbook is provided to all language minority parents new to the district. The handbook helps parents to become familiar with the district's language assistance program. The LAP program staff, including the classroom teacher, communicates regularly with parents regarding the student's Individualized Instructional Plan, the language development services, and the student's progress.

The district supports language minority parents' involvement in their children's academic success with different initiatives. An Adult ESL program is offered to language minority parents. Project FLUENT, a ten week family literacy program covering different aspects of literacy and reading is offered to language minority students and parents of all the district's elementary schools at Chapelwood Elementary School. Sign-in sheets for every day of training, the evaluation form in English and Spanish, and parents' comments were presented during the review. Another offering, for Latino parents, Voices in Action, with the goal to increase Latino parents' involvement in education of their children, was conducted in September, October and November of 2010. Letters to language minority Ben Davis HS parents in English and Spanish as well as the agenda for ENL Orientation were presented during the review. LAP staff makes phone calls in Spanish inviting EL students' parents to teacher/parent conferences.

#### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.4**

The letter sent by the MSD Wayne Township to parents notifying them about their child's testing results and placement in the language assistance program gives the following description of English proficiency levels:

Level 1: Beginning  
Level 2: Early Intermediate  
Level 3: Intermediate  
Level 4: Proficient  
Level 5: Above Proficient

The MSD Wayne Township 2010-11 LAP/ENL Placement Form that was completed after the spring LAS Links English Proficiency testing and sent to parents reads: "During the school year, students scoring Levels 1, 2, 3 will attend a LAP cluster class taught by a certified English as Second Language (ESL) teacher to increase your child's English proficiency and knowledge of the academic content using native language support when possible, small group instruction, and modifications to classroom assignments and assessments. Levels 4-5 students will continue to be monitored by an ESL teacher. All students enrolled in the Language Assistance Program are eligible for services until they exit the program and it is determined that a language instruction educational program is no longer needed".

**Required Action:** The levels of English proficiency adopted by the IDOE, assessed by the LAS Links Proficiency test and required for reporting on the DOE-LM yearly report are:

Level 1: Beginner  
Level 2: Early Intermediate  
Level 3: Intermediate  
Level 4: Advanced  
Level 5: Proficient

**By February 1, 2011,** MSD Wayne Township must submit evidence that any communication to parents, students, administrators, and instructional staff contains the correct description of English language proficiency levels:

- 1) Submit to IDOE the updated Parent Notification letter in English and Spanish.
- 2) Provide evidence that EL student of levels 1 – 4 are described by the district as LEP (limited English proficient) hence needing language development services and accommodations on ISTEP+ and ECAs, and level 5 EL students are described as FEP (Fluent English proficient) hence being monitored and not eligible for any accommodations on standardized testing.
- 3) Submit the corrected MSD Wayne Township 2010-11 LAP/ENL

Placement Form. While students of higher levels of English proficiency, especially level 4, may not need direct ESL services, they are still eligible for accommodations on classroom assignments and assessments.

4) Provide evidence that the updates are shared throughout the district.

## **Monitoring Topic 2.5: Compliance with Program Design and Implementation Requirements**

### **Background**

IDOE interviewed the Title III program administrator, school principals and Title III program staff regarding program design and implementation requirements.

*Statutory Requirements are contained in Section 3115.*

### **Areas of Compliance**

**Certified Staff are Fluent in English:** MSD Wayne Township provided evidence that all certified and classified staff working in language instruction programs are fluent in the English language. A list of all certified and classified staff working in the LAP program in 2010-11 was presented. PRAXIS test score printouts, copies of college transcripts, diplomas, or Educational Credential Evaluators' reports for U.S. educational equivalence were presented for all classified staff. For all certified staff, Indiana educator license information and teaching assignments from the Office of Educational Licensing and Development were presented during the review.

**Supervision of Instructional Paraprofessionals:** All instructional paraprofessionals in MSD Wayne Township's LAP program work under the supervision of a certified ENL or general education teacher. MSD Wayne Township's document, "Key Roles and Responsibilities of LAP Paraprofessionals" reiterates that "A paraprofessional will assist with pull-out or push-in whenever the LAP teacher thinks it will be beneficial for the student(s). A paraprofessional will follow a lesson plan prepared by the teacher based on students' level and ability." LAP program paraprofessionals are required to participate in all LAP meetings and professional development.

**English Language Development Program Model:** Language development in the district is provided by ESL teachers using different approaches through a combination of push-in and pull-out based on levels of English proficiency.

There are three certified ENL teachers at Chapel Hill Elementary School. Language development is provided through a multi-grade Newcomer group for EL students of Level 1-2 for 30 min. a day and through co-teaching and push-in support in the general education classroom during the day. Level 3 and 4 students are serviced by grade level with a focus on reading and writing based on academic standards. Classroom teachers are supported by the certified ENL program staff. During collaboration meetings, ENL and mainstream staff analyze achievement data, discuss EL students' progress and address any concerns about language acquisition and academic progress. Part of the reading block is designated for whole group reading instruction and the other part (30 min) – for individual and small group instruction during which ENL teachers provide language development for EL students through pull-out and push-in support. All mainstream teachers at the school are using ELP (English Language Proficiency) Standards and LAS Links reports by skill areas to modify their instruction using small group instruction and cooperative learning.

Chapel Hill Junior High School has two certified ENL teachers and one paraprofessional. Chapel Hill Junior High School utilizes a Sheltered Instruction approach to instruction. At Chapel Hill Junior High School, ENL teachers co-teach in the classroom with English/Language Arts teachers. Language development is provided through such a model for EL students of Level 2 and 3. An ENL class taught by a certified ENL teacher is provided daily for Level 1 students through a 7-8 grade ENL class. Level 2-3 students are served in the regular English/LA class co-taught by a certified E/LA teacher and certified ENL teacher. There is a high level of collaboration between the mainstream ENL program through weekly team meetings.

At Ben Davis High School, level 1 and 2 EL students receive language development through ENL 1 and ENL 2 classes taught by a certified teacher, receiving E/LA credit, and through Study Hall class where they receive Basic Skills credit. EL students of Level 3 have an ENL 3 class for credit. EL students of Levels 1 – 4 are scheduled with SIOP-trained teachers or E/LA ENL certified teachers which provides all EL students in the school with quality Sheltered instruction in all subject areas.

EL Resource Room support is offered to all EL students. Team teaching utilizing the SIOP model as well as Project-Based Learning is implemented in the school; both approaches are effective ways to educate EL students and promote successful language and content learning. A high degree of collaboration is evident. ELP Standards are used to create language objectives in all mainstream classes. There is a consistent grading policy for EL students. Multiple EL students' progress reports with teacher follow-up and suggestions on poor grades were presented during the review. IIPs for EL students are in an electronic format. Teachers are required to sign off upon receipt of the IIPs. HS parent orientation is provided to all EL students with information provided on HS diplomas, AP courses, and Career Center information. The ENL Club (60 EL students) meets monthly and is college-oriented.

**Instruction and Assessment Adaptations:** EL students' Individualized Instructional Plans are shared with the general education teachers. Appropriate instruction for the students based on their levels of English proficiency and ELP Standards are discussed during teacher team collaboration time. Grading is based on modified curriculum to the levels of English proficiency of the EL students so that they are able to show their knowledge in various ways.

**Reclassification and Monitoring:** The exiting process is systematic throughout the district, based on the IDOE exiting guidance, is documented in the LAP Handbook and shared with the instructional staff. Upon EL students reaching proficiency, a "LAP Student Exit List" is completed by the LAP staff. ENL and mainstream teacher recommendations are part of the exiting process. Monitoring forms for FEP (Fluent English Proficient) students are completed electronically. Sample FEP students' monitoring forms with subject area teachers' comments about the students' progress were presented during the review. Teachers monitor students every nine weeks. MSD Wayne Township provided evidence that the monitoring and reclassification processes are documented and are consistent for EL students throughout the school corporation. Monitoring forms of FEP (Fluent English Proficient) students were presented during the visit.

**Scheduling:** Evidence was provided by the district that students are scheduled for classes based on their specific language development needs; ENL teachers' input and their knowledge of language proficiency levels and corresponding capabilities of EL students are used to schedule students. EL students' schedules and grade summaries were presented during the review.

**Retention:** The policy of not allowing EL students to be retained based on their lack of English proficiency is observed by MSD Wayne Township and is based on the Indiana Department of Education's guidelines related to the retention of EL students. Teacher training, LAP and general education program teacher collaboration, and RTI contribute to the administration and teachers' understanding of the difference between EL students' content knowledge and English proficiency.

Light's Retention Scale is used by the district when retention is recommended. The "LAP Student Retention List" documenting student test scores, academic progress, modifications/adaptations implemented in the classroom, language development provided, and other relevant information was presented during the review. A file for an EL student considered for retention was presented for review. The file contained students' academic assessment samples, reading assessments, LAS Links scores by skill area, the Individualized Instructional Plan, language development services provided, and modifications/adaptations to the classroom instruction.

**Special Education Referrals:** A thorough process is used to determine the appropriateness of referrals of EL students to Special Education. The Indiana Department of Education's guidelines and policies related to referral to Special Education are used in the MSD Wayne Township Handbook. The district uses Woodcock-Munoz to identify native (Spanish)

language proficiency to learn more about EL students' educational background. The "MSD of Wayne Township Referral and Evaluation of School Age Minority Children" document is used by the LAP Child Study team to recommend EL students for review by the Case Conference Committee.

A document from Wayne Twp. Special Services manual describing the process was presented during the review.

**Collaboration Across Programs:** ENL teachers attend grade level meetings and discuss EL students' progress on a regular basis. EL students are provided extra educational support through the variety of programs for which they may qualify. Examples of such collaboration include: district's professional development, sharing materials, RTI grade level meetings, data analysis meetings, and scheduling.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2.5**

There are no findings, required actions, or recommendations for Topic 2. 5.

### **FISCAL MONITORING** (see the attached Fiscal Monitoring Report):

#### **Monitoring findings**

1. The general ledger fund used to track NESP expenses also included expenses for other programs. MSD Wayne Township had to manually track the individual expense accounts that were related to NESP.

**Required Action:** A separate fund must be set-up for each program. By **February 1, 2011**, MSD Wayne Township must submit the description of the process that will be used to track individual expense accounts separately from the general fund.

2. The actual costs of the English proficiency placement tests are not charged to Title III; however, teachers that are charged to Title III are administering the tests, and their time to administer the tests would be charged to the grant.

**Required Action:** by **February 1, 2011**, MSD Wayne Township must provide evidence that Title III funds are not used to cover costs associated with administration of English proficiency placement tests (i.e., LAS Links Placement Test/PreLAS 2000) including substitutes or stipends to administer and score the initial screening.

3. There are two split funded employees charged to the Title III grant: the Program Director and Program Director's administrative assistant.

**Required Action:** by **February 1, 2011**, MSD Wayne Township must provide evidence to demonstrate that the district has reserved no more than 2% of its Title III allocation for grant administration.